

1 Marc Dawson  
 2 P.O. Box 3030  
 2 High Desert State Prison  
 Susanville, CA 96127-3030  
 3 CDGR #P-13296

FILED

2008 AUG 28 P 3 03

4 In Pro Per

5 RICHARD W. WIEKING  
CLERK6 UNITED STATES DISTRICT COURT U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

7 Marc Dawson,

No. C 08-0741 JF (PR)

8 Plaintiff,

PLAINTIFF'S REQUEST FOR THE

9 v.

PRODUCTION OF DOCUMENTS

10 S. Latham, et al.,

(Rule 34, Fed.R.Civ.P.)

11 Defendants,

Set No. Two

13 PROPOUNDING PARTY: PLAINTIFF MARC DAWSON

14 RESPONDING PARTY: DEFENDANT B. JAIN

15 SET NO.: TWO

18 TO DEFENDANT AND HER COUNSEL OF RECORD:

19 PLEASE TAKE NOTICE that pursuant to Rule 34 of the Federal Rules of Civil  
 20 Procedure, Plaintiff MARC DAWSON hereby requests that the Defendant, B. JAIN, is to  
 21 produce the following documents for inspection or copying, or supplying copies, to  
 22 the Plaintiff within 30 days of service.

23 DEFINITIONS

24 a) "YOU" and "YOUR" shall mean JAIN and where applicable, her attorneys, agents,  
 25 servants, employees, investigators, experts, consultants, and all other persons acting  
 26 or purporting on her behalf.

27 b) "CONCERNING" includes referring to, responding to, relating to, connected with,  
 28 commenting on, regarding, discussing, showing, describing, reflecting, or analysing.

1       (c) "DOCUMENT" means all written material of any kind, including, but  
2 not limited to, letters, memoranda, records, minutes, contracts, memoranda  
3 or records of telephone or personal conversations or conferences, office  
4 or interoffice communications, correspondences, bulletins, circulars or  
5 pamphlets, studies, reports, accounting records, books, notes, worksheets,  
6 video tapes, photographs, tape recordings, or any other message imprinted  
7 in a medium allowing for its storage, also computer printouts, cards, discs  
8 or tapes, or other software, or copies of such documents where the originals  
9 are not available, in your custody or control, or of which you have any  
10 knowledge of.

11     (d) "IDENTIFY" with respect to facts, means a statement including dates  
12 and locations, and parties thereto.

13     (e) "IDENTIFY" with respect to persons, means the name and current or  
14 last-known address of each person so listed.

1       (f) "IDENTIFY" with respect to documents, means describe each document  
16 with sufficient specialty for purposes of a Request for Production of Docu-  
17 ments, pursuant to Fed.R.Civ.P. 34, including the date, author, and custo-  
18 dian of the document.

19     (g) "INCIDENT" shall mean the interactions during the time period that  
20 is complained about in the Plaintiff's complaint, between you and Plaintiff  
21 between the dates of June 8, 2006, through June 15, 2006, and which is al-  
22 leged in his Complaint for Failure to give adequate medical care and the  
23 deliberate indifference to a known serious medical need, filed with the  
24 United States District Court for the Northern District of California, Case  
25 No. C 08-0741.

26

27

28

1                           DOCUMENTS REQUESTED

2  
3       1. YOU admitted to authoring the report entered into the Plaintiff's medical file  
4       on 6-15-08 (RFA, SET 1, REQ. NO. 6) and that YOU also entered the information in the  
5       section entitled "PLAN" (RFA, supra). YOU entered into the Plaintiff's medical file that  
6       "in the clinic he was noted to have RT eye twitching (intentional)." Produce and identify  
7       documents that support YOUR entry CONCERNING the Plaintiff's RT eye twitching being  
8       intentional.

9  
10      2. YOU denied that YOU made an error in your entry into the Plaintiff's medical  
11       file on 6-15-08 concerning YOUR entry that the Plaintiff had intentional twitching in  
12       his right eye and that YOUR observation was made and based upon the medical information  
13       that was available to YOU (RFA, SET 1, NO. 12). Produce and identify documents that YOU  
14       relied upon to base YOUR observation on CONCERNING the Plaintiff's RT eye twitching in-  
15       tentionally.

16      /S/ Marc Dawson  
17      Marc Dawson, Plaintiff

18      Dated: August 20th, 2008.

19      ///

20      ///

21      ///

Filed 08/28/2008 Page 4 of 5

Wm. H. Denk  
P.O. Box 3030, B-209  
Highway Dept., Hwy  
Suwannee, Fla. 36127-3030

୩୩

STATE PRIS.

Office of the Clerk  
U.S. D.C.  
200 South First St., San Jose,  
San Jose, Ca.

9311343002 2060



John  
Smith